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Gillian C. Thomas Associate gthomas@hpmb.com

June 19, 2008

VIA HAND DELIVERY & REGULAR MAIL

Honorable Shira A. Scheindlin United States District Court 500 Pearl Street, Room 1620 New York, NY 10007-1312

Re: Jeffrey Goodson v. New York City, Department of Correction, et al.

08 CV 1130 (DC)

Your Honor:

This office is trial counsel to the New York City Law Department in the abovereferenced pro se matter. We were recently retained to represent the defendants in this matter. By way of this correspondence, we respectfully request an adjournment of time to July 31, 2008 to answer or otherwise respond on behalf of said defendants. No prior request has been made for an extension of time.

The time requested is required to allow us an opportunity to investigate plaintiff's claims with respect to the defendants and prepare their response to the amended complaint. The time requested is also necessary in order to complete the retrieval and review of information from various agencies and employees and contractors of the City of New York. In addition, the time is required to investigate whether to provide representation to some or all of the defendants, assuming they are served and request representation, pursuant to General Municipal Law § 50-k and/or contracts governing the City's relationship with the private entities and employees.

Thank you for your consideration in this matter.

graved & Ckterdants

July 31, Respectfully Submitted,

DROGRED:

HEIDELL, PITTONI, MURPHY & BACH

HEIDELL, PITTONI, MURPHY & BACH, LLP U.S.V.J.

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Honorable Shira A. Scheindlin

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cc: BY CERTIFIED MAIL

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